

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division

IN RE:	:
	:
KAILASH C. CHOPRA	: Case No.:11-34750-WIL
	: Chapter 11
Debtor	:
_____	:

**DEBTOR'S OPPOSITION TO MOTION TO CONVERT CASE TO CHAPTER 7**

NOW COMES the Debtor, by and through undersigned counsel, and hereby opposes the Office of the United States Trustee's Motion to Convert this case to a Chapter 7 proceeding, and hereby states as follows:

1. That undersigned counsel has had to prepare to leave for Baltimore, Maryland on Sunday, October 28<sup>th</sup>, in order to help his senior citizen parents get ready for the unusual storm designated as Sandy. A response is due on Monday, October 29. Undersigned counsel will file an Amended Opposition detailing his Opposition, but the basis for the Opposition is that by surrendering properties, Dr. Chopra's household has freed up money, that there may not be equity in Dr. Chopra's company's property in Hagerstown, Maryland (Apnaghar, LLC Chapter 7 Case No.:11-30786-TJC), and that the Chapter 7 Trustee in that case may be willing to operate the adult assisted living care facility in the Hagerstown property as a rental, but Dr. Chopra and his wife, Anita Chopra, who is in a Chapter 7 herself, still have to present this option to the Chapter 7 Trustee. It is undersigned counsel's position that Dr. Chopra's estate does not have assets that would reach the unsecured creditors.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Jonathan C. Silverman, LLC  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was delivered via ECF to the Office of the United States Trustee and all creditors on the mailing matrix, and to the creditors not listed on ECF by first class mail postage prepaid this 29<sup>th</sup> day of October, 2012.

\_\_\_\_\_/s/\_\_\_\_\_  
Jonathan C. Silverman